

EXHIBIT 13

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:  
The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of
GRETA JOHNSON, 30(b)(6)

January 15, 2019
8:30 a.m.

Taken at:

Sheraton Suites Akron
1989 Front Street - Portage Room
Cuyahoga Falls, Ohio

Stephen J. DeBacco, RPR

<p style="text-align: right;">Page 194</p> <p>1 personal contact with it, and I'm lucky. I'm 2 lucky in that my family has not. But it is 3 personal to me when parents and community 4 members come to their government looking for 5 answers, looking for help, those can't be 6 monetized. Those can't be bullet-pointed, 7 because that loss of human capital and the loss 8 of trust in the community, in doctors, in 9 patient care, because they know now how their 10 kids started. They know what caused this, 11 and -- and that is a harm that this community 12 will be trying to rebuild for decades. 13 Q. Okay. Ms. Johnson, what I'm asking 14 you right now is whether there are any injuries 15 for which Summit County is seeking damages in 16 this case that are not listed in the response 17 that appears on pages 15 to 17 of this exhibit. 18 A. The medical -- 19 (Telephonic interruption.) 20 MS. WINNER: If you're on the 21 phone, if you would please put yourself on 22 mute. 23 A. Are the increased costs to the 24 medical examiner's office listed here? 25 Q. I'm sure it is. If not, we'll come</p>	<p style="text-align: right;">Page 196</p> <p>1 The other part of that, opioid 2 epidemic that impacts that, is that we have 3 created a new class of felons who cannot seek 4 certain employment and might not be able to 5 seek the employment they had prior to falling 6 victim to addiction. 7 So I think there's -- there is a 8 loss that's beyond just the physical presence 9 of people we've lost, but also the ability of 10 people to work in certain fields because of the 11 felonization of -- of this epidemic. 12 Q. Anything else that's not on the 13 list? An injury for which Summit County seeks 14 damages in this case? 15 A. I think it could be argued that -- 16 the very last bullet point is cost for child 17 services and foster care for opioid-dependent 18 babies and foster children, so that's just a 19 really small portion of it. 20 Our -- our Children's Service Board 21 had to seek an increase in their levy this 22 year. And levy campaigns cost money. And the 23 driving factor behind the request for increase 24 is the opioid epidemic. And so the costs of 25 that campaign really to try and support this</p>
<p style="text-align: right;">Page 195</p> <p>1 back to it. 2 A. The other costs that I think should 3 be reflected -- and again, probably tough to 4 monetize -- is the compassion fatigue that our 5 first responders and treatment providers are 6 incurring, and sort of the resources that we're 7 trying to put toward that effort of making sure 8 that those folks are supported, that they don't 9 become overwhelmed by hopelessness, and that 10 they don't become overwhelmed by the sheer 11 volume and turn cold to it. 12 So there have been efforts to try 13 and address that, both through the medical 14 community and through the first responder 15 community and all of those things. Any time 16 there's an investment of time, there's an 17 investment of treasure, and I think that that 18 is something that's missing. 19 Q. Anything else? 20 A. I think that there's also -- the 21 portion that talks about the loss of tax 22 revenue due to the decreased efficiency and 23 size of the working population, I read that as 24 we had a lot of people die, so our population 25 decreased.</p>	<p style="text-align: right;">Page 197</p> <p>1 fundamental service I feel like could be 2 included with the Children's Services portion. 3 Q. Anything else? I'm not asking you 4 to explain anything that's here. I'm going to 5 go -- 6 A. Sure. 7 Q. -- through each item that's on the 8 list. I just wanted to know if there's 9 anything else that's not on the list. 10 A. I don't see anything that's 11 standing out right now. 12 Q. Okay. Well, let's go back to the 13 top of the list, then. 14 A. Okay. 15 Q. The first item is, "Losses caused 16 by the decrease in funding available for 17 Plaintiff's public services for which funding 18 was lost because it was diverted to other 19 public services designed to address the opioid 20 epidemic." 21 What public services -- for what 22 public services was funding lost because it was 23 diverted to other public service? 24 A. Well, specifically in Summit County 25 we have deferred capital improvements. We've</p>

<p style="text-align: right;">Page 198</p> <p>1 deferred, you know, what I would call 2 enhancement projects, things meant to enhance 3 our community because our resources were 4 laser-focused on the opioid epidemic. 5 So where public health, for 6 instance, really would like to spend their time 7 promoting this T21 initiative that they have, 8 eliminating the ability for our youth to buy 9 tobacco products. A lot of science behind how 10 tobacco can change your brain makeup and how 11 it's important to not do that at an early age. 12 I know that that is an initiative they take 13 really seriously and wanted to promote, but it 14 really takes a back seat to the opioid 15 strategies and -- and programs. 16 Additionally, in Summit County 17 we've got health issues like anyone else. I 18 didn't know that diabetes was such a huge 19 health issue in Summit County. It is. It's 20 our number one health issue, outside of 21 addiction, that -- that public health was 22 targeting. And -- and all of those things get 23 pushed to the side. Those important community 24 initiatives get pushed to the side, because 25 when people are dying immediately, you know,</p>	<p style="text-align: right;">Page 200</p> <p>1 perform several autopsies for outside agencies 2 for cost, and that was a stream of revenue that 3 we were able to help fund some of -- of the 4 operations there. Can no longer do that 5 because we don't have the capacity to do it, 6 and our -- and the funds there have to go to 7 what's happening in front of them. 8 I know that we have used grant 9 dollars to help support the expansion of our 10 drug courts, that perhaps those dollars could 11 have been used in a prevention setting or could 12 have been used for some other law enforcement 13 purpose, but because of the need for increased 14 capacity in drug courts, we -- we have 15 designated grant dollars for that as well. 16 And -- and likewise, those judges, 17 their time that would normally have been spent 18 on a variety of different cases is focused 19 on -- on drug cases, and certainly a huge 20 percentage of which are opioids. 21 I'm trying to go around the county 22 in my mind. 23 I -- that's -- that's -- I think 24 that's where I'm at on that. 25 Q. Well, you said -- let me take you</p>
<p style="text-align: right;">Page 199</p> <p>1 it's -- it's all hands on deck for that. 2 Q. So -- 3 A. Obvious- -- 4 Q. Go ahead. 5 A. With law enforcement, we have 6 detectives who are, you know, responding to 7 overdose cases frequently. And those, as we've 8 discussed, are incredibly difficult to 9 investigate for a myriad of reasons, and their 10 time is, therefore, tied up in those cases 11 rather than, you know, folks who have had their 12 home burglarized or their car stolen. 13 And we also have a lot of our 14 resources being put into things like our Quick 15 Response Teams that we never had to do before, 16 but we know that Quick Response Teams are 17 effective, and so we put money toward them. So 18 the number of other things that don't get the 19 attention or the money that they typically 20 would or should get because we're busy trying 21 to save people's lives with -- with these 22 efforts. 23 I know that in the medical 24 examiner's office we have lost a stream of 25 revenue. Our medical examiner's office used to</p>	<p style="text-align: right;">Page 201</p> <p>1 through some of these. This was -- has money 2 been taken away -- that was already allocated 3 to T21 taken away from it? 4 A. I don't know that money was taken 5 away, but certainly focus. 6 Q. How about money that was dedicated 7 to diabetes, whatever was going to be done 8 about diabetes, has anything been taken away 9 from that? 10 A. I -- again, I think where you've 11 got time invested, you know, from people, 12 that's money. So when you take people off of, 13 you know, particular initiatives and refocus 14 them on something else, that is a diversion 15 of -- probably not the right word -- that's a 16 shift in dollars. 17 Q. Were specific people taken off 18 diabetes? 19 A. I don't know that for sure. I just 20 know that that's not something that they are 21 focused on. I shouldn't say that. That's 22 unfair. 23 I know that what is coming out of 24 public health frequently, and investments of 25 new dollars are going into are ways to mitigate</p>

<p style="text-align: right;">Page 202</p> <p>1 harm, harm -- harm reduction for the opioid 2 crisis. 3 Q. Okay. What -- but this bullet 4 point talks funding being diverted to other 5 public services -- 6 A. Right. 7 Q. -- so my question is, what was 8 their -- what was the specific funding or -- or 9 resources, whether it was particular people, 10 that -- that was supposed to be -- you know, 11 was allocated out for diabetes and got diverted 12 elsewhere? 13 A. I don't -- I don't know how to 14 specifically answer what was allocated for 15 diabetes, but I know we spent \$10,000 on 16 fentanyl strips. \$10,000 that could have been 17 spent on diabetes prevention. \$10,000 that 18 could have been spent on T21. But because harm 19 reduction is so critical in our community, 20 \$10,000 was spent on fentanyl strips. 21 The increase in dollars that are 22 being spent on the needle exchange. Certainly 23 those are dollars that weren't previously being 24 spent on needle exchange, but because the 25 demand is so high and the harm reduction</p>	<p style="text-align: right;">Page 204</p> <p>1 overdoses. 2 Q. Are there any -- is -- is the -- is 3 Summit County seeking damages in this case for 4 injuries suffered by the City of Akron? 5 THE WITNESS: Thank you. 6 A. Well, I mean, we don't -- we are 7 separate entities, certainly. Akron's in 8 Summit County, and what happens in Akron does 9 affect Summit County. So an arrest that's made 10 in the City of Akron by Detective Leonard, that 11 becomes a Summit County case. It's a felony. 12 So the City of Akron arrest goes 13 through Akron Municipal Court, comes to Summit 14 County Common Pleas court, goes through our 15 prosecutor's office, goes through our Common 16 Pleas court system, our drug court. Our ADM 17 provides services. Our health department 18 provides services. 19 So we're certainly separate 20 entities, but what happens with nearly half of 21 our population impacts what goes on in Summit 22 County. 23 Q. Is Summit County seeking damages in 24 this case for injuries suffered by the City of 25 Akron?</p>
<p style="text-align: right;">Page 203</p> <p>1 benefit of that is so great, that those dollars 2 are not being spent on those other things. 3 Q. What -- in a -- in a law 4 enforcement category, you say that there are 5 people who are investigating over- -- 6 overdoses. Were those people who were 7 previously assigned to do something else 8 specifically, and if so, what? 9 A. Well, there are two detectives in 10 the Summit County Sheriff's Office who are 11 general division detectives, but they respond 12 to any fatal overdose scene. So that means 13 they leave their desk and whatever rape, 14 robbery or homicide they're working on and 15 their attention has to be focused on -- on this 16 overdose. 17 I know the City of Akron had two 18 detectives who were working in, you know, 19 the -- the drug unit who were earmarked 20 specifically to investigate overdose deaths 21 because there were so many. 22 That's to say nothing of all of the 23 other police officers throughout the county who 24 would be proactively policing and are spending 25 lots of time on calls for service regarding</p>	<p style="text-align: right;">Page 205</p> <p>1 MS. FLOWERS: Objection. Asked and 2 answered. 3 A. We're -- we're both independently 4 seeking our own damages, is the way I 5 understand the -- the case. 6 Q. So if the -- if the City of Akron 7 police department suffers an injury, that's not 8 part of the injury for which Summit County is 9 seeking damages, correct? 10 MS. KEARSE: Objection. 11 A. Again, it's tough because you get 12 arrested in the city of Akron, you're coming to 13 the Summit County Jail. So I -- I know that 14 they're -- that we're seeking -- we're two 15 separate plaintiffs, certainly, but the 16 aggregate harm, to me, is what I always come 17 back to. 18 You know, I will leave to the 19 lawyers to make the determination of -- of 20 where that line separates, but to me it's 21 difficult for me to separate out what happens 22 in Akron from what happens in Summit County 23 because they're the same thing. Everything in 24 Akron is in Summit County. 25 Q. Is the --</p>